

Remarks

Claims 1-15 are pending in the application. Reconsideration and allowance of the application are respectfully requested.

The non-final Office Action dated October 11, 2007 lists the following rejection: claims 1 and 3-6 stand rejected under 35 U.S.C. 102(e) over Chang *et al.* (U.S. Patent No. 7,058,747). Claim 2 is indicated as allowable if rewritten in independent form.

In response to the Office Action's request to add additional labels to the boxes in the drawings, Applicant respectfully declines. The boxes in Figures 1-3 are already labeled with reference numbers, which are described in detail in Applicant's specification. Thus, the boxes in the drawings are labeled as required. *See, e.g.*, M.P.E.P. § 608.02(b). Accordingly, Applicant declines to add additional labels as such labels are unnecessary and not required.

Applicant respectfully traverses the Section 102(e) rejection of claims 1 and 3-6 because the cited portions of the Chang reference are largely unrelated to the claimed invention. The lack of correspondence between the Chang reference and the claimed invention can best be illustrated by a better understanding of Chang. The Chang reference is directed to a bus interface circuit 401 that includes a USB host controller 412 and a USB device controller 410. *See, e.g.*, Figure 4. When Chang's bus interface circuit 401 operates as a USB host, host controller 412 is linked to a processor via host interface 407 and connection 402, and when Chang's bus interface circuit 401 operates as a USB device, device controller 410 is linked to the processor via device interface 408 and connection 402. *See, e.g.*, Col. 9:25-38. The host controller 412 has access to a USB bus via connection 403 and the device controller 410 has access to the USB bus via connection 404. Chang's bus interface circuit 401 contains both a USB host controller 412 and a USB device controller 410, which allows a device (connected via 402) to interface with a USB bus (via connections 403 and 404) and to function as either a USB host or a USB device.

In contrast to the Chang reference, the interface integrated circuit of Applicant's claimed invention connects to an external USB device controller. Instead of including a USB device controller as in Chang, the claimed invention makes use of a USB device controller that is already part of a device, thus eliminating the need for the interface

integrated circuit to include a USB device controller. *See, e.g.*, Paragraphs 0009-0011. The following discussion more particularly points out the lack of correspondence between the Chang reference and the claimed invention.

Regarding claim 1, the cited portions of Chang do not correspond to aspects directed to second external terminals coupled to the device interface for connection to an external USB device controller. The Office Action improperly asserts that Chang's connection 403 connects to an external USB device controller. In actuality Chang teaches that connection 403 enables USB device controller 410 (which is part of bus interface circuit 401) to access a USB bus. As discussed in detail above, Chang's bus interface circuit 401 contains a USB device controller 410 and thus does not connect to an external USB device controller as does the interface integrated circuit of the claimed invention.

Regarding claims 3 and 5, the cited portions of Chang do not correspond to aspects directed to an interface integrated circuit having a transceiver with a device interface that is connected to the USB device controller in a functional circuit. The Office Action improperly cites to Chang's USB device controller 410 (which is part of bus interface circuit 401) as somehow corresponding to the USB device controller of the functional circuit. Applicant submits that the Office Action's assertion of correspondence is illogical because Chang's USB device controller 410 is part of bus interface circuit 401, not part of the functional circuit as in the claimed invention.

Regarding claim 6, the cited portions of Chang do not correspond to aspects directed to passing USB signals from the transceiver of the interface integrated circuit to a device controller in the functional circuits outside the integrated circuit during USB device controller operation. As discussed in detail above, Chang's USB device controller 410 is part of bus interface circuit 401. *See, e.g.*, Figure 4. Thus, Chang does not teach passing USB signals to a device controller that is outside of bus interface circuit 401 as in the claimed invention.

In view of the above, the cited portions of the Chang reference do not correspond to the claimed invention. Accordingly, the Section 102(e) rejection of claims 1 and 3-6 is improper and Applicant requests that it be withdrawn.

Applicant further traverses the Section 102(e) rejection of claim 4 because the cited portions of Chang do not correspond to aspects directed to operating in a first speed mode as a USB host and operating in a second speed mode as a USB device, which is different from the first speed mode. The cited portions of Chang teach two modes of operation, one being a low power consumption mode with a lower clock speed; however, Chang does not mention that the low power consumption mode has any relation to whether Chang is operating as a USB host or as a USB device. *See, e.g.*, Col. 8:65 to Col. 9:8. Thus, the cited portions of Chang are unrelated to operating at a different speed when the device is functioning as a USB host then when the device is functioning as a USB device as in the claimed invention. Accordingly, the Section 102(e) rejection of claim 4 is improper and Applicant requests that it be withdrawn.

Applicant notes that minor amendments have been made to claims 3 and 5 to improve readability. These amendments are not being made to overcome any of the rejections raised by the Office Action, which fail for the reasons discussed above.

Applicant has also added new claims 7-15. Applicant respectfully submits that claims 7-15 are allowable over the Chang reference for at least the reasons discussed above in that these claims depend from one of claims 1, 3 and 5-6. Applicant notes that claims 7, 11 and 13 contain aspects similar to those of claim 2, which Applicant believes form the basis for claim 2 being allowable over the Chang reference. Thus, Applicant submits that (as is consistent with the instant Office Action) claims 7, 11 and 13 are allowable over the Chang reference.

In view of the remarks above, Applicant believes that each of the rejections has been overcome and the application is in condition for allowance. Should there be any remaining issues that could be readily addressed over the telephone, the Examiner is asked to contact the agent overseeing the application file, Peter Zawilski, of NXP Corporation at (408) 474-9063 (or the undersigned).

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